

KHALE J. LENHART, #7-4581
TYSON R. WOODFORD, #8-6650

Hirst Applegate, LLP
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

MARC FEINSTEIN (*pro hac vice*)
WILLIAM PAO (*pro hac vice*)
DAVID IDEN (*pro hac vice*)

O'Melveny & Myers
400 South Hope Street
Los Angeles, CA 90071-2899
Phone: (213) 430-6000
Fax: (213) 430-6407
mfeinstein@omm.com
wpao@omm.com
diden@omm.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA
CRYPTO INC., a Delaware corporation;
BIT ORIGIN, LTD., a Cayman Island
Company; SONIC HASH LLC, a Delaware
limited liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY,
a Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES
1-18, related persons and companies who
control or direct some or all of the named
Defendants,

Defendants.

HIRST APPLGATE, LLP

LAW OFFICES
P.O. BOX 1083
CHEYENNE, WYOMING 82003-1083

***BITMAIN TECHNOLOGIES GEORGIA LIMITED'S DESIGNATION
OF JOHN KENYON HAYWARD AS EXPERT WITNESS***

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and Local Civil Rule 26.1(e)(1) of the United States District Court for the District of Wyoming, Defendant Bitmain Technologies Georgia Limited (“Bitmain”) hereby designates the following expert witness, whom Bitmain may use at trial:

John Kenyon Hayward
HashWatt, Inc.
2 Bala Plaza, Suite 300
Bala Cynwyd, PA 19004
Telephone: (610) 660-7800

Mr. Hayward is the Chief Executive Officer of HashWatt, Inc., a closely held private bitcoin miner incorporated in the State of Delaware. He has extensive experience managing cryptocurrency mining facilities and has served as a business entrepreneur and executive for more than 35 years. Mr. Hayward may be contacted through counsel.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), Bitmain hereby provides Mr. Hayward’s signed Expert Report, attached hereto as **Exhibit A**.

Mr. Hayward’s curriculum vitae is attached as **Appendix A** to his report. Mr. Hayward is being compensated at a rate of \$980 per hour. If Plaintiff takes Mr. Hayward’s deposition, Plaintiff is responsible for paying Mr. Hayward’s fee of \$980/hour for his deposition time.

Pursuant to Federal Rule of Civil Procedure 26(e)(2), Bitmain reserves the right to supplement Mr. Hayward’s report.

Dated: 22 July 2024

BITMAIN TECHNOLOGIES GEORGIA
LIMITED, Defendant

BY: s/Khale J. Lenhart

KHALE J. LENHART, #7-4581
TYSON R. WOODFORD, #8-6650
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain Technologies
Georgia Limited
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

and for

MARC FEINSTEIN (*pro hac vice*)
WILLIAM PAO (*pro hac vice*)
DAVID IDEN (*pro hac vice*)
400 South Hope Street
Los Angeles, CA 90071-2899
Phone: (213) 430-6000
Fax: (213) 430-6407
mfeinstein@omm.com
wpao@omm.com
diden@omm.com

CERTIFICATE OF SERVICE

I certify the foregoing ***Bitmain Technologies Georgia Limited's Designation of Kenyon Hayward as Expert Witness*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 22 July 2024, and that copies were served as follows:

Patrick J. Murphy, #5-1779
Scott C. Murray, #7-4896
Williams, Porter, Day & Neville, P.C.
159 North Wolcott, Suite 400
P. O. Box 10700
Casper, WY 82602-3902
pmurphy@wpdn.net
smurray@wpdn.net
Attorneys for Plaintiff

- ☐ U.S. MAIL
- ☐ FED EX
- ☐ FAX
- ☐ HAND DELIVERED
- ☐ EMAIL
- ☒ E-FILE

Sean M. Larson, #7-5112
Kari Ann Hartman, #8-6507
Hathaway & Kunz, LLP
P. O. Box 1208
Cheyenne, WY 82003-1208
slarson@hkwyolaw.com
khartman@hkwyolaw.com
Attorneys for Defendants Mineone, Terra Crypto

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Paula Colbath, *Pro Hac Vice*
Sarah Levitan Perry, *Pro Hac Vice*
Alex Inman, *Pro Hac Vice*
Loeb & Loeb, LLP
345 Park Avenue
New York, NY 10154
pcolbath@loeb.com
sperry@loeb.com
ainman@loeb.com
Attorneys for Defendants Mineone, Terra Crypto

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Jane M. France, #7-4828
Meggan Hathaway, #7-4856
Sundahl Powers Kapp & Martin LLC
500 W. 18th Street, Suite 200
Cheyenne, WY 82001
jfrance@spkm.org
mhathaway@spkm.org
Attorneys for Defendant Bit Origin Ltd., SonicHash

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Marc S. Gottlieb, I, *Pro Hac Vice*
Ortoli Rosenstadt, LLP
366 Madison Avenue, 3rd Floor
New York, NY 10022-5616
msg@orlip.legal
Attorneys for Defendant Bit Origin Ltd., SonicHash

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

s/Norma J. Hubka
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain Technologies Georgia
Limited